

# Exhibit H-2

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF NEW YORK**

MOOG INC.,

Plaintiff,

v.

SKYRYSE, INC., ROBERT ALIN PILKINGTON,  
MISOOK KIM, and DOES NOS. 1-50,

Defendants.

Case No. 1:22-cv-00187

**DEFENDANT MISOOK KIM'S  
RESPONSES TO PLAINTIFF MOOG INC.'S FIRST SET OF  
REQUESTS FOR ADMISSION**

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213-485-1500

*Attorneys for Defendants  
Robert Alin Pilkington and Misook Kim*

Defendant Misook Kim (“Ms. Kim”) provides the following responses to the Requests for Admission, Set One, propounded by plaintiff Moog Inc. (“Plaintiff”), as follows:

**PRELIMINARY STATEMENT**

These responses are made solely for the purpose of this action. Each answer is subject to all objections as to competence, relevance, materiality, propriety and admissibility, and any and all other objections and grounds which would require the exclusion of any statement herein if the requests were asked of, or any statements contained herein were made by, a witness present and testifying in Court, all of which objections and grounds are reserved and may be interposed at the time of trial.

Except for explicit facts admitted herein, no incidental or implied admissions are intended hereby. The fact that Ms. Kim has answered any request should not be taken as an admission that Ms. Kim accepts or admits the existence of any facts set forth or assumed by such requests, or that such response constitutes admissible evidence. The fact that Ms. Kim has answered part or all of any request is not intended and shall not be construed to be a waiver by Ms. Kim of all or any part of any objection to any request made by Ms. Kim.

The Preliminary Statement is incorporated into each of the responses set forth below.

**REQUESTS FOR ADMISSION**

**REQUEST FOR ADMISSION NO. 1:**

Admit that Kim retained possession of Moog Confidential Information upon beginning her employment at Skyrise.

**RESPONSE TO REQUEST NO. 1:**

Ms. Kim objects that the Request is vague and ambiguous as to the terms “retained possession” and “Moog Confidential Information.”

Subject to and without waiving the foregoing objection, Ms. Kim responds as follows:

Ms. Kim admits that she had possession of some of Moog's information, documents, records, files and data that were non-public, proprietary and confidential, including Source Code, when she began her employment at Skyrise, Inc. ("Skyrise"). Except as expressly admitted, Ms. Kim denies the remainder of the Request.

**REQUEST FOR ADMISSION NO. 2:**

Admit that Pilkington retained possession of Moog Confidential Information upon beginning his employment at Skyrise.

**RESPONSE TO REQUEST NO. 2:**

Ms. Kim objects that the Request is vague and ambiguous as to the terms "retained possession" and "Moog Confidential Information."

Subject to and without waiving the foregoing objection, Ms. Kim responds as follows:

Ms. Kim admits that Alin Pilkington had possession of some of Moog's information, documents, records, files and data that were non-public, proprietary and confidential, including Source Code,

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when Mr. Pilkington began his employment at Skyrise. Except as expressly admitted, Ms. Kim denies the remainder of the Request.

Dated: New York, New York  
April 13, 2022

/s/ Joseph N. Froehlich

Joseph N. Froehlich  
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VERIFICATION

U.S. DISTRICT COURT, WESTERN DISTRICT OF NEW YORK.

I have read the foregoing

**(1) DEFENDANT MISOOK KIM'S RESPONSES TO PLAINTIFF MOOG INC.'S  
FIRST SET OF REQUESTS FOR ADMISSION; AND**

**(2) DEFENDANT MISOOK KIM'S RESPONSES TO PLAINTIFF MOOG INC.'S  
FIRST SET OF REQUESTS FOR PRODUCTION**

and know their contents.

X CHECK APPLICABLE PARAGRAPH

☒ I am a party to this action. The matters stated in the foregoing document are true of my own knowledge except as to those matters which are stated on information and belief, and to those matters I believe them to be true.

☐ I am ☐ an officer ☐ a partner ☐ \_\_\_\_\_, a party to this action, and am authorized to make this verification for and on its behalf, and I make this verification for that reason. ☐ I am informed and believe and on that ground allege that the matters stated in the foregoing documents are true. ☐ The matters stated in the foregoing documents are true of my own knowledge except as to those matters which are stated on information and belief, and as to those matters I believe them to be true.

☐ I am one of the attorneys for \_\_\_\_\_, a party to this action. Such party is absent from the county of aforesaid where such attorneys have their offices, and I make this verification for and on behalf of that party for that reason. I am informed and believe and on that ground allege that the matters stated in the foregoing document are true.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on April 12, 2022, at Torrance, California.

  
Misook Kim

PROOF OF SERVICE

**Moog Inc. v Skyrise, Inc. et al.**  
**U.S. District Court – Western District - Case No.: 1:22-cv-00187-LJV-JJM**

At the time of service, I was over 18 years of age and not a party to this action. I am employed in the County of Los Angeles, State of California. My business address is 300 South Grand Avenue, Suite 2600, Los Angeles, CA 90071.

On April 13, 2022, I served true copies of the following document(s) described as:

**DEFENDANT MISOOK KIM'S RESPONSES TO PLAINTIFF MOOG INC.'S FIRST  
SET OF REQUESTS FOR ADMISSION**

on the interested parties in this action as follows:

**SEE ATTACHED SERVICE LIST**

**BY E-MAIL OR ELECTRONIC TRANSMISSION:** I caused a copy of the document(s) to be sent to the persons at the e-mail addresses listed in the Service List. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct and that I am employed in the office of a member of the bar of this Court at whose direction the service was made.

Executed on April 13, 2022, at Los Angeles, California.



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Kristina M. Koch

**SERVICE LIST**

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